

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

R'KES STARLING, individually and on behalf of all others similarly situated

Plaintiff,

V.

**PR ADVISORS, LLC D/B/A PINNACLE
REALTY ADVISORS and
RAM PROPERTIES, LLC**

Defendants.

Civil Action No. 1:24-cv-000991-DII

**DEFENDANT RAM PROPERTIES, LLC’S MOTION TO DISMISS
THROUGH JOINDER WITH AND ADOPTION OF DEFENDANT
PR ADVISORS, LLC’S MOTION TO DISMISS**

Defendant RAM Properties, LLC (“RAM”) hereby moves to dismiss the putative class action complaint filed by Plaintiff R’Kes Starling (“Plaintiff”) (**Dkt. 1**) (the “Complaint”) in its entirety and would respectfully show the Court as follows:

I. JOINDER WITH AND ADOPTION OF PR ADVISORS, LLC’S MOTION TO DISMISS

On behalf of the “National Do Not Call Registry Class,” Plaintiff makes the same allegations and asserts the same claim against Defendants RAM and PR Advisors, LLC for alleged violations of the Telephone Consumer Protection Act. On this day, November 26, 2024, Defendant PR Advisors, LLC filed its Motion to Dismiss the Complaint (**Dkt. 11**) (“PR Advisors’ Motion”) pursuant to Rule 12(b)(1) and/or 12(b)(6) of the Federal Rules of Civil Procedure. Because the Defendants are similarly situated, RAM hereby joins and adopts PR Advisors’ Motion in its entirety and incorporates it fully into this Motion by reference. Fed. R. Civ. P. 10.

II. GROUNDS FOR DISMISSAL

The same incurable defects in the Complaint urged by PR Advisors, LLC are equally applicable to RAM. Therefore, the Court should dismiss the Complaint against RAM in its entirety pursuant to Rule 12(b)(1) and/or 12(b)(6) of the Federal Rules of Civil Procedure for the same reasons set forth in PR Advisors' Motion.

WHEREFORE, PREMISES CONSIDERED, Defendant RAM prays that this Court grants this Motion, dismisses the Complaint in its entirety, and grants all other and further relief to which RAM may show itself entitled, whether at law or in equity.

Dated: November 26, 2024

Respectfully submitted,

By: /s/ Yusuf A. Bajwa

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CERTIFICATE OF SERVICE

This will certify that a true and correct copy of the foregoing document was served this 26th day of November 2024 to all parties via PACER.

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